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10 Attorney for Plaintiff
11 IRMA RAMIREZ
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ,) CASE NO.: 15-CV-01547-EMC
Plaintiff,)
v.)
YUCATASIA; et al.,)
Defendants.)
-----)

**STIPULATION and [PROPOSED]
ORDER TO CONTINUE THE
FURTHER CASE MANAGEMENT
CONFERENCE**

The parties by and through their respective attorney of record stipulate to continue the Further Case Management Conference currently set for June 23, 2016 at 10:30 a.m. for the following reasons:

1. **Whereas**, the parties have reached a settlement and are currently finalizing the settlement agreement;
2. **Whereas**, on June 10, 2016, defendants sent over their changes to the settlement agreement;

1 3. **Whereas**, plaintiff's counsel has been on vacation and has not had an opportunity
2 to review defendants' changes to the settlement agreement.

3 4. **Therefore**, the parties respectfully request that the Further Case Management
4 Conference currently scheduled for June 23, 2016 at 10:30 a.m. be continued to either July 25,
5 2016 at 10:30 a.m., September 1, 2016 at 10:30 a.m., and or a date convenient to the Court.

6 **IT IS SO STIPULATED.**

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8 Dated: June 15, 2016

9 Respectfully submitted,
10 THOMAS E. FRANKOVICH,
11 **A PROFESSIONAL LAW CORPORATION**

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13 By: /s/Thomas E. Frankovich
14 Thomas E. Frankovich
15 Attorney for Plaintiff

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17 Dated: June 15, 2016

18 LEPERA + ASSOCIATES, PC

19
20 (erroneously

21 By: /s/ Joseph A. Lepera
22 Joseph A. Lepera
23 Attorneys for Defendants
24 PHUONG DUONG dba YUCATASIA
25 sued as DUONG PHUONG)

26
27 Dated: June 15, 2016

28 LAW OFFICES OF JOSEPH A. SACRAMENTO

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30 By: /s/ David John Foran
31 David J. Foran
32 Attorneys for Defendants Lorraine T.C. Dun,
33 Trustee of the Lorraine T.C. Dun Survivor's Trust;
34 and Trustee of the Edmund Y.K. Dun Bypass Trust

1 [PROPOSED] ORDER
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4 **IT IS SO ORDERED** that the Case Management Conference set for June 23, 2016 at
5 10:30 a.m. is continued to August 4, 2016, at 10:30 a.m./ p.m.. The parties shall file a
6 Joint Case Management Statement no later than seven (7) days prior to the Conference.
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9 Dated: June 16, 2016
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